

In the Matter of ET Docket No. 04-37

To The Commission:

The Commission asks for input regarding a database for the purpose of quickly mitigating BPL interference complaints. The burden of finding those who are in authority to take action in mitigating interference complaints must not be placed on licensed users of the spectrum. Such a database or databases are essentially so that those who suffer interference from Access BPL installations can receive prompt attention and their complaints mitigated.

I propose that this database be publicly accessible. Some databases labeled "public" that are not necessarily open and/or easily accessible. This must not be the case for Access BPL. The definition of "publicly accessible" should mean openly available to anyone, at any time without the need to go through an intermediary, some other "permission" process, or travel great distances to view or gain access. In addition to other means, the database should be accessible in a searchable Internet page format, perhaps similar to that used by the Commission to provide licensing information. Although each provider would provide its own database for local access it is important that these be brought together in a centralized database so that parties experiencing interference could have a "master point of contact" in identifying and mitigating such cases of interference. Employing a "master point of contact" also allows an advantage in that portable or mobile stations in unfamiliar territory would know whom to contact to resolve interference issues. The database must provide information concerning each BPL device, including a unique ID tag, name of the responsible provider including contact information directly to those with knowledge and authority to immediately take mitigating action, functional description of the BPL device, physical location, power levels, frequencies used, operational status, and a log indicating the history of interference complaints received and mitigation measures taken with this device to curtail them, including the time taken by the provider to address and resolve the issue. To further aid in their identification, and coordinate with the databases, I propose that each utility pole have placards placed displaying the unique ID tag of the BPL device it contains, the placards being made visible using no more than modest optical means (binoculars) from the public right of way. Another suitable form of identification must be made for those BPL devices employed in areas having underground wiring. Providers must be required to keep databases current. Real time updating is not unreasonable in today's "information age" but in no case must latency greater than five days be permitted.

In its NPRM the Commission notes "that hundreds of kinds of unlicensed devices are successfully operating under Part 15 limits without causing interference to licensed operations (paragraph 34). Although this statement may be true from a "complaint received" standpoint it is not really a fair one, being the fact that it is almost impossible to identify an offending Part 15 device when it is in the privacy of a neighbor's living room! Thankfully such cases of interference are usually transitory, very limited in operating frequency, and low in duty cycle. BPL,

however, is a "different animal", continually operating, simultaneously using wide ranges of the frequency spectrum, and potentially high duty cycles, launching energy along an uncertain medium. Fortunately, it is not located in the privacy of a family's home or apartment but rather, in most cases, mounted high on power poles in full view. Any "real time" adaptive or "on the fly" frequency notching interference mitigation measures that the Access BPL industry indicates it is capable of performing (NPRM paragraph 41) are wasted and for not without the support of an accompanying "real time" interference mitigation feedback structure. The database requirements described herein are essential to the success of this structure.

Respectfully submitted this Third Day of May, 2004,

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